

1 Zoya Kovalenko (Cal. SBN 338624)
13221 Oakland Hills Blvd., Unit 206
2 Germantown, MD 20874
(678) 559-4682
3 zoyavk@outlook.com
Plaintiff Zoya Kovalenko
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8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 OAKLAND DIVISION

11 ZOYA KOVALENKO,

12 *Plaintiff,*

13 v.

14 KIRKLAND & ELLIS LLP, MICHAEL
DE VRIES, MICHAEL W. DEVRIES,
15 P.C., ADAM ALPER, ADAM R. ALPER,
P.C., AKSHAY DEORAS, AKSHAY S.
16 DEORAS, P.C., AND MARK FAHEY,

17 *Defendants.*
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Case No. 4:22-cv-05990-HSG

**DECLARATION OF ZOYA
KOVALENKO IN SUPPORT OF
PLAINTIFF'S REPLY REGARDING
PLAINTIFF'S MOTION TO NOTICE
TERMINATION OF FILIPPATOS PLLC
FOR CAUSE AND TO REQUIRE
FILIPPATOS PLLC TO PROVIDE
CLIENT FILE TO PLAINTIFF**

Re: Dkt. Nos. 171, 180

Hearing noticed for Thursday, March 20, 2025,
at 2:00 pm, before the Honorable Haywood S.
Gilliam, Jr., United States District Judge, at
1301 Clay Street, Fourth Floor, Courtroom 2,
Oakland, California 94612

**DECLARATION OF ZOYA KOVALENKO IN SUPPORT OF
PLAINTIFF’S REPLY REGARDING MOTION TO NOTICE TERMINATION OF
FILIPPATOS PLLC FOR CAUSE AND TO REQUIRE FILIPPATOS PLLC TO
PROVIDE CLIENT FILE TO PLAINTIFF**

I, Zoya Kovalenko, declare as follows:

1. I am the plaintiff in this action, *Kovalenko v. Kirkland & Ellis LLP*, No. 4:22-cv-05990-HSG (N.D. Cal.). I submit this declaration in support of and as an attachment to Plaintiff’s Reply Regarding Plaintiff’s Motion to Notice Termination of Filippatos PLLC for Cause and to Require Filippatos PLLC to Provide Client File to Plaintiff.

2. I am familiar with the facts and circumstances of this litigation. I know the facts set forth in this declaration to be true of my own personal knowledge. If called as a witness, I could and would testify competently to the matters set forth in this declaration.

3. I am an attorney duly licensed to practice in the state of California. My California State Bar number is 338624. I am and have been admitted to practice before this Court since September 23, 2022. On November 4, 2022, I filed a Notice of Appearance, Dkt. No. 11, as counsel for plaintiff in this action. I have not filed any notice to withdraw or substitute my appearance in this action.

4. I strongly disagree with any assertion that this dispute with Filippatos PLLC (“Filippatos”) boils down to a fee dispute. My decision to fire Filippatos for cause and place myself in a public dispute with Filippatos, my former counsel, was done for reasons transcending any of my financial interests. I fired Filippatos because I had been humiliated and betrayed by individuals in whom I had placed my trust (Tanvir Rahman and Parisi (Gerry) Filippatos) and made this decision to protect my lawsuit, individual dignity, and rights as a client.

5. The arbitration language in the retainer agreement between me and Filippatos (Kovalenko Decl. ISO Mot. Notice Termination, Attach. B (Retainer Agreement) at 3–4, Dkt. No. 171-3) was drafted by Filippatos.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in Germantown, Maryland on February 19, 2025.

/s/ Zoya Kovalenko

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zoyavk@outlook.com
Plaintiff Zoya Kovalenko